

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MICHAEL SMITH, WAYNE BOYD, and	§	
DEDRICK WILEY, on Behalf of Themselves	§	
and all Others Similarly Situated,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. 3:20-cv-3618-B
	§	
P & B INTERMODAL SERVICES, LLC,	§	
	§	
Defendant.	§	

PLAINTIFFS' AGREED STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiffs Michael Smith, Wayne Boyd, and Dedrick Wiley, on behalf of themselves and the nine (9) Opt-in Plaintiffs in the above captioned lawsuit (collectively "Plaintiffs") hereby agree and stipulate that this action is hereby dismissed with prejudice in its entirety pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

1. Defendant P&B Intermodal Services, LLC ("Defendant") consents to this Stipulation of Dismissal with Prejudice pursuant to Rule 41(a)(1)(A)(ii) as shown by the signature of its counsel below.

2. There are no pending motions before the Court as of the filing of this document.

3. By the signatures of their counsel of record below, Plaintiffs and Defendant (collectively the "Parties") hereby dismiss all claims and/or counter-claims in the above-captioned lawsuit with prejudice with the respective Parties bearing their own court costs and attorney's/attorneys' fees except as otherwise agreed by the Parties.

4. This stipulation is effective upon filing of this document and no Court order is required pursuant to Federal Rule of Civil Procedure 41(a)(1)(A).

Date: March 21, 2022.

Respectfully Submitted,

s/ Allen R. Vaught

Allen R. Vaught
TX Bar No. 24004966
Vaught Firm, LLC
1910 Pacific Avenue, Suite 9150
Dallas, Texas 75201
Telephone: (972) 707-7816
Fax: (972) 591-4564
avaught@txlaborlaw.com

ATTORNEY FOR PLAINTIFFS

Respectfully Submitted,

s/ Carolyn A. Pellegrini

Carolyn A. Pellegrini
(Admitted Pro Hac Vice)
Saul Ewing Arnstein & Lehr, LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
Phone: 215-972-7121
Fax: 215-972-7725
carolyn.pellegrini@saul.com

John A Basinger
TX Bar No. 00796173
Saul Ewing Arnstein & Lehr, LLP
1037 Raymond Blvd., Ste. 1520
Newark, NJ 07102
Phone: 973-286-6724
Fax: 973-286-6824
Email: john.basinger@saul.com

Christopher D. Montez
TX Bar No. 24032748
E-mail: crossmontez@gmail.com
12222 Merit Drive, Suite 1200
Dallas, TX 75251
Telephone: (214) 202 – 2571
Fax: (877) 765 – 6488

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

Counsel for Plaintiffs and Defendant conferred on the subject matter of this document on March 21, 2022, and counsel for Defendant indicated that Defendant agrees with the filing of this document.

s/Allen R. Vaught
Allen R. Vaught

CERTIFICATE OF SERVICE

On March 21, 2022, I electronically submitted the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the CM/ECF method. I certify that I have served all counsel of record electronically.

s/Allen R. Vaught
Allen R. Vaught